

Wichita Plant



April 25, 2013

## CERTIFIED MAIL 7010 3090 0003 3945 3089 Return Receipt Requested

Attn: Chief, RCRA Corrective Action and Permits Branch AWMD/WRAP US EPA Region 7 11201 Renner Blvd Lenexa, Kansas 66219

RE: 1st QUARTER 2013 QUARTERLY PROGRESS REPORT; OCCIDENTAL CHEMICALS CORPORATION, WICHITA PLANT; USEPA ID# KSD007482029

Dear Sir:

Enclosed please find the Quarterly Progress Report, as required by Occidental Chemical Corporation's RCRA hazardous waste permit number KSD007482029. This report summarizes the activities conducted for Part II of the Facility's RCRA Permit during the first quarter of 2013. In addition, please find enclosed the most recent version of the RFI Schedule, which is dated April 24, 2013, for your review and use. If you have any questions, please call Lisa R. Blair at 316/529-7204.

Sincerely,

Steve Hieger Plant Manager

**Enclosure** 

c.c.: Mostafa Kamal; KDHE

Brad Roberts, USEPA Region VII

Juan Somoano; GSHI

Steven R Hieger

Lisa Blair; OCC Bruce Clegg; CRA CERTIFIED MAIL: 7010 3090 0003 3945 3096

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## Occidental Chemical Corporation, Quarterly Progress Report January 1, 2013 through March 31, 2013

Pursuant to Occidental Chemical Corporation's (OCC) hazardous waste permit KSD007482029, Part II, Section C.13, OCC is submitting this quarterly progress report. This report updates the progress of RCRA Corrective Action activities conducted during the first quarter of 2013.

- Submitted the second 2012 Semiannual Groundwater Monitoring report.
- A quarterly building monitoring and inspection event was completed. The completed reporting form was submitted to EPA.
- Submitted to EPA a response to comments letter and a revised Phase I On-Site Groundwater RCRA Facility Investigation Summary Report.
- Submitted to EPA a response to comments letter and a revised Penta Area and Shipping Phase II RFI Summary Report.
- Submitted an investigative summary report for the RFI investigations conducted in the Stormwater Ponds and Fuel Depot Areas.
- Completed monitoring well abandonments and replacements for select monitoring well locations.
- Continued operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Continued with the implementation of modifications to the groundwater extraction and treatment system.
- There have been no releases of hazardous materials to report.



Work scheduled for the second quarter of 2013 includes:

- Complete the first 2013 semiannual groundwater monitoring event.
- Commence Phase II investigation activities pursuant to recommendations presented in the Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report.
- Commence investigation activities pursuant to recommendations presented in the Inorganics Area Supplemental Report.
- Continue operation of the interceptor well network for groundwater control around Occidental's Wichita plant.
- Continue with the implementation of modifications to the groundwater extraction and treatment system.
- Conduct and report a quarterly building inspection and pressure monitoring event.
- Submit the NPDES permit modifications application.

## Notifications:

Outage scheduled to begin April 2<sup>nd</sup> and conclude by April 26<sup>th</sup>. Work activities include inspection and repair of Basin #3, putting the neutralization unit in service, repairs on several cooling towers, replacement of chlorine header piping, and several other general maintenance jobs.





DATE	CORRECTIVE ACTION CHRONOLOGY EVENT									
07/07/2008	Draft Work Plan for Indoor Soil Gas Sampling									
07/07/2008	Comments to QAPP Addendum 04/18/08									
07/07/2008										
07/11/2008	Request for Interim Measures for Railroad Tracked Areas									
07/25/2008	Revised Asbestos Surface Impoundment SWMU Interim Corrective Measure Implementation Report									
07/28/2008	2008 2nd Quarter Progress Report									
08/05/2008	Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)									
08/08/2008	Notice of Plug & Abandonment of DW #4									
08/08/2008	Request for Extension of QAPP Comment Response									
08/15/2008	Response to Railroad Tracked Areas Interim Measures Letter									
08/18/2008	Interim Corrective Measures Implementation Report for Asbestos Surface Impoundment SWMU									
09/03/2008	Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)									
09/19/2008	Revised Draft Work Plan for Indoor Soil Gas Sampling									
09/22/2008	Comments to Draft Work Plan for Indoor Soils Gas Sampling									
09/30/2008	Approval Letter for Work Plan for Indoor Soils Gas Sampling									
10/03/2008	Comments to Draft Work Plan for Collection & Analysis of Groundwater Samples (Appendix 9)									
10/30/2008	Appendix IX Semi-Annual Groundwater Monitoring Report									
11/03/2008	Draft Work Plan for Collection & Analysis of Groundwater Samples									
11/21/2008	Off-Site Soils Gas Sampling Data Evaluation Report									
11/21/2008	Off-Site Geoprobe Groundwater Investigation Report									
01/05/2009	Draft QAPP									
01/19/2009	Indoor Soils Gas Sampling Report									
01/23/2009	Sub-Slab Soils Gas Sampling									
01/28/2009	Semi-Annual Neighbor Well Data									
01/28/2009	4 <sup>th</sup> Quarter Corrective Action Report									
02/10/2009	Direct Push Investigation Comments to EPA									
02/12/2009	Off-Site Geoprobe Groundwater Investigation Report									
02/20/2009	Soil Gas Sampling Data Evaluation Comments to EPA									
03/19/2009	Soils Gas Sampling Data Evaluation									
03/26/2009	2009 Ongoing Activities Cost Estimate									





DATE	CORRECTIVE ACTION CHRONOLOGY EVENT									
04/20/2009	Off-Site Geoprobe Report									
04/21/2009	Email responding to QAPP Comments									
04/30/2009	Semi-Annual Groundwater Report									
04/30/2009	Monitor Well Inspection Summary Report									
05/08/2009	Response to Comments for Sub-Slab Soils Gas Sampling Report									
06/08/2009	Final QAPP and SAP Reports									
06/30/2009	RFI Investigation Work Plan for Landfill, Hex Pits, and Brine Ponds									
06/30/2009	ICM Effectiveness Evaluation Report									
08/26/2009	Revised RFI Work Plan for Alpha Cake Landfill, Hex Waste Pits and Brine Ponds									
09/14/2009	Response to EPA's Comments letter dated July 9, 2009 regarding on-Site vapor intrusion									
09/14/2009	On-Site Vapor Intrusion Investigation, Assessment and Interim Corrective Measures Implementation Report									
11/30/2009	Draft Penta Area and Shipping RFI Work Plan									
12/14/2009	Response to EPA Comments & Submission of Revised Interceptor Well ICM Effectiveness Evaluation Report									
12/22/2009	Supplemental Off-Site Soil Gas Sample Collection and Analysis, 1 <sup>st</sup> Quarterly, letter submission									
12/30/2009	Preliminary Draft Phase I Summary/Phase II Recommendations letter report									
01/15/2010	Response to EPA Comments – On-Site VI, Assessment & Interim ICM Implementation Report									
02/12/2010	Final Revision to Interceptor Well ICM Effectiveness Report									
02/12/2010	Second 2009 Semiannual Groundwater Monitoring Report									
02/16/2010	Received comments from EPA for Penta Area and Shipping RFI Work Plan									
02/19/2010	Phase I Summary/Phase II Recommendations Letter Report (final), Alpha Cake Landfill, Hex Waste Pits and Brine Ponds RFI Work Plan									
04/30/2010	Response to EPA Comments – Penta Area and Shipping RFI Work Plan									
04/30/2010	Revised Penta Area and Shipping RFI Work Plan									
05/17/2010	Resampling of MW137S1 Letter to EPA									
05/28/2010	Inorganics Area RFI Work Plan									
07/09/2010	Received comments from EPA for Inorganics Area RFI Work Plan									
08/11/2010	Response to EPA Comments – Inorganics Area RFI Work Plan									
08/11/2010	Revised Inorganics Area RFI Work Plan									
08/24/2010	First Semiannual Groundwater Monitoring Report									
09/23/2010	Groundwater Screening (near MW-140) Investigation Summary Letter									





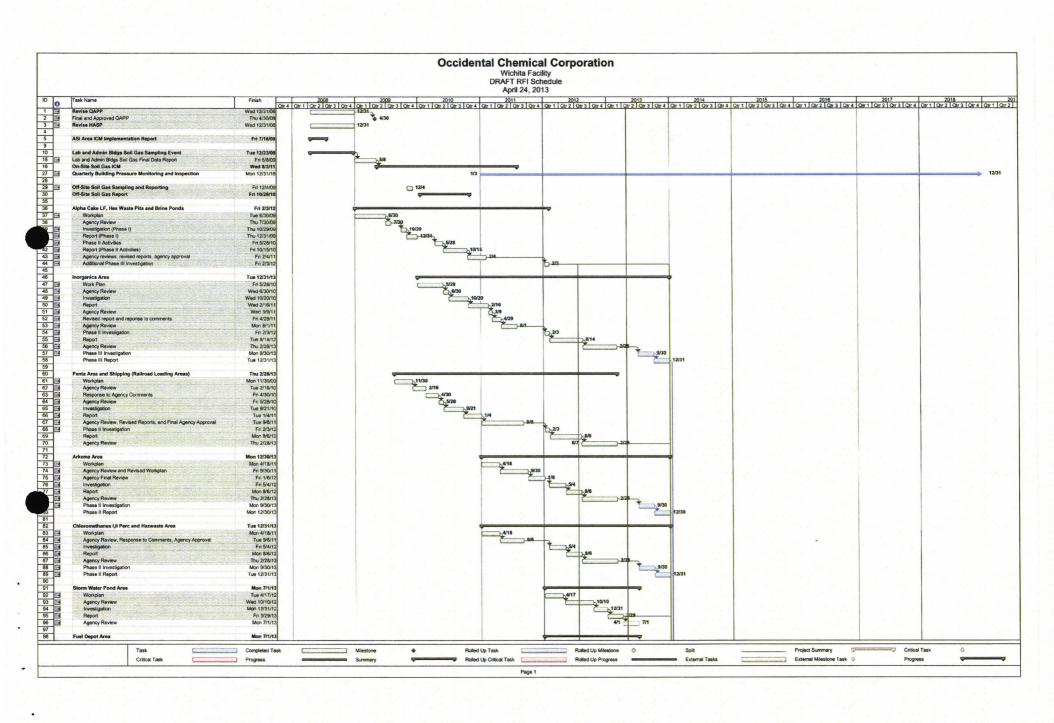
DATE	CORRECTIVE ACTION CHRONOLOGY EVENT									
10/4/2010	Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings									
10/15/2010	RFI Summary Report for the Alpha Cake Landfill, Hex Waste Pits and Brine Ponds									
10/29/2010	Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report									
12/20/2010	Response to EPA Comments on the Operation and Maintenance Plan for On-Site Vapor Intrusion ICM for on-Site buildings									
12/16/2010	Received comments from EPA for Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report									
12/16/2010	Received comments from EPA for RFI Summary Report, Alpha Cake Landfill, Hex Waste Pits and Brine Ponds									
12/30/2010	Comprehensive Well Survey letter submittal to EPA									
1/4/2011	Penta Area and Shipping RFI Summary Report									
1/17/2011	Response to EPA comments and revised Supplemental Quarterly Off-Site Soil Gas Monitoring Summary Report									
1/18/2011	Response to EPA comments and revised RFI Summary Report – Landfill Areas									
2/16/2011	Inorganic Area RFI Summary Report									
2/23/2011	Second 2010 Semiannual Groundwater Monitoring Report									
3/2/2011	Draft Conceptual Design Summary for Groundwater ICM Modifications									
4/18/2011	Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan									
4/18/2011	Arkema Area Investigative Work Plan									
4/29/2011	Response to EPA comments and revised RFI Summary Report – Penta Area and Shipping									
4/29/2011	Response to EPA comments and revised RFI Summary Report – Inorganics Area									
5/2/2011	On-Site Vapor Intrusion Mitigation ICM Construction Completion Report									
6/17/2011	Response to EPA comments and revised Preliminary Conceptual Design Groundwater ICM Modifications Rpt									
6/30/2011	On-Site Groundwater RFI Work Plan									
6/30/2011	Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form									
7/20/2011	1 Response to EPA comments and revised Arkema Area Investigative Work Plan									
8/1/2011	Response to EPA comments and revised On-Site Vapor Intrusion Mitigation ICM Construction Completion Rpt									
8/18/2011	11 First 2011 Semiannual Groundwater Monitoring Report									
8/22/2011	Response to EPA comments and revised Penta Area and Shipping RFI Summary Report									
8/22/2011	Response to EPA comments and revised Chloromethanes I, II, Perc and Hazwaste Areas RFI Work Plan									
8/26/2011	Response to EPA comments and revised Conceptual Design Groundwater ICM Modifications Report									
9/12/2011	Response to EPA comments and revised Groundwater Monitoring Program Summary Table									
9/30/2011	Response to EPA comments and revised Arkema Investigative Work Plan									





DATE	CORRECTIVE ACTION CHRONOLOGY  EVENT									
10/31/2011	Vapor Intrusion ICM Inspection and Pressure Monitoring Record Report Form									
11/14/2011	Received EPA comments on On-Site Groundwater RFI Work Plan									
11/14/2011	Received EPA approval letter for Arkema Area Investigative Work Plan									
11/30/2011	Sampling and Analysis Plan									
12/14/2011	Response to Comments and Revised On-Site Groundwater RFI Work Plan									
1/5/2012	EPA Comments on Draft Sampling and Analysis Plan									
1/27/2012	EPA Comments on On-Site Groundwater RFI Work Plan									
2/8/2012	Response to Comments and Revised Sampling and Analysis Plan									
2/20/2012	Second 2011 Semiannual Groundwater Monitoring Report									
3/9/2012	Revised Sampling and Analysis Plan (SAP)									
3/13/2012	Revised Standard Operating Procedures 4 for SAP									
3/19/2012	Response to Comments and Revised On-Site Groundwater RFI Work Plan									
3/21/2012	EPA Approval letter – On-Site Groundwater RFI Work Plan									
4/17/2012	Stormwater Ponds Area RFI Work Plan									
4/17/2012	Fuel Depot Area RFI Work Plan									
8/6/2012	Penta Area and Shipping Phase II RFI Summary Report									
8/6/2012	Chloromethanes I, II, Perc and Hazwaste Areas RFI and Arkema Area Investigation Summary Report									
8/13/2012										
8/14/2012	Inorganics Area Supplemental Report									
8/17/2012	Formal Notification of Additional SWMUs									
8/24/2012	First 2012 Semiannual Groundwater Monitoring Report									
11/14/2012	Class I Modification Letter for Additional SWMUs									
11/15/2012	Phase I On-Site Groundwater Investigation RFI Summary Report									
2/22/2013	3 Second 2012 Semiannual Groundwater Monitoring Report									
3/7/2013	Response to EPA Comments and Revised Penta Area and Shipping Phase II RFI Summary Report									
3/15/2013	Response to EPA Comments and Revised Phase I On-Site Groundwater RFI Summary Report									
3/22/2013	Fuel Depot and Stormwater Ponds Area RFI Summary Report									





## **Occidental Chemical Corporation** Wichita Facility DRAFT RFI Schedule April 24, 2013 Tue 4/17/12 Agency Review Investigation Report Wed 10/10/12 Mon 12/31/12 12/31 Fri 3/29/13 7/1 Mon 7/1/13 Appendix IX GW Sampling Even Semiannual Groundwater Repor Thu 7/31/08 Fri 8/24/18 7/31 0 0 0 0 0 0 0 0 0 0 0 0 0 Interceptor Well ICM Operation Tue 5/31/16 \$430 251 12/14 5430 7330 Off-Site South Groundwater Investigation Interceptor Well ICM Effectiveness Evaluation Wed 12/31/08 Tue 6/30/09 12/31 Mon 8/31/09 Response to Agency Comments S1 Aquifer Test Piezometer and Monitoring Well Installation Mon 12/14/09 Fri 4/30/10 S2/S3 Aquifer Test Interceptor Well System Report Revised Groundwater Monitoring Program Fri 12/31/10 Mon 3/14/1 Agency Review, Response to Comments, Agency Approval Draft Conceptual Design Groundwater ICM Modification Rpt Fri 9/30/11 Wed 3/2/11 Agency Review Thu 5/5/11 Final Conceptual Design Groundwater ICM Modification Rpl Fri 6/17/1 Agency Approval Groundwater ICM Modification Implementation Report Tue 9/6/1 Tue 12/31/13 IW29 and IW30 Repairs Fri 12/30/11 Groundwater Monitoring Program Sampling and Analysis Plan Wed 11/30/11 Agency Approval Monitoring Well Abandon Wed 2/29/12 Fri 3/29/13 On-Site Groundwater Investigation Phased On-Site Groundwater Investigation Workplan Wed 12/31/14 Thu 6/30/11 11/14 Agency Review Response to Comments Mon 11/14/11 Wed 12/14/11 Mon 1/30/12 Agency Review Phase I On-Site Groundwater Investigation Wed 7/4/12 11/16 Phase I On-Site Groundwater Final Report 9/30 Thu 11/15/12 Agency Review Phase II Groundwater Activities Fri 6/28/13 Mon 9/30/13 Phase II Groundwater Report Phased Groundwater Investigation Mon 6/30/14 Wed 12/31/14 DRAFT Human Health Risk Assess Wed 12/31/14 EPA Review FINAL Human H Tue 3/31/15 3/31 Mon 6/29/15 Tue 3/31/15 EPA Review Thu 4/30/15 Mon 2/29/16 Mon 5/30/16 Site-wide Corrective Measures Study EPA Review Corrective Measures Imple Mon 1/1/18 Tue 10/30/18 Quarterly Progress Report

 Task Critical Task		Completed Task Progress	Milestone Summary	Rolled Up Task Rolled Up Critical Task		Rolled Up Milestone Rolled Up Progress	<b>♦</b>	Split External Tasks	Mily has all the management and the second distance of the second di	Project Summary  External Milestone Task	( ¢	Critical Task Progress	<b>*</b>
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